

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Commission Order Instituting)	
Investigation into the Rates, Charges,)	I.95-02-015
Services, and Practices of Pacific Gas &)	(Filed February 22, 1995)
Electric Company (U 39 M))	
)	
Order Instituting Rulemaking for Electric)	R.96-11-004
Distribution Facility Standard Setting.)	(Filed November 8, 1996)
)	

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL
COMPLIANCE REPORT FILED PURSUANT TO GENERAL ORDER NO 165**

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Dated: [July 2, 2001](#)

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Pursuant to General Order No. 165 ("G.O. 165") and Decision No. 97-03-070 issued by the California Public Utilities Commission (the "Commission"), and to Rule 32 of the Commission's Rules of Practice and Procedure (Title 20, *Cal. Code Reg's* § 3.2), Southern California Edison Company ("SCE") hereby files this Annual Compliance Report describing our compliance activities completed in 2000 and compliance activities planned for 2001.

I.

INTRODUCTION AND SUMMARY

In 2000, SCE completed 3,964 circuit patrols covering 2,292,723 pieces of equipment, 355,801 detailed and intrusive inspections, and 15,262 corrective actions. This report contains two attachments which are attached hereto and incorporated herein by this reference: Attachment A is a table containing summary data of SCE's compliance activities for 2000 presented on a systemwide basis.

Attachment B contains a series of tables providing a detailed presentation of SCE's 2000 compliance activities, by equipment type, with district-by-district breakdowns.

II.

BACKGROUND

California Public Utilities Code Section 364^{1/} requires the Commission to adopt standards for the inspection, maintenance, repair, and replacement of electric utility distribution facilities. Subdivision (b) of that section provides that, in setting standards for maintenance, repair, and replacement, the Commission shall consider cost, local geography and weather, applicable codes, national electric industry practices, sound engineering judgment, and experience.

In Decision No. 96-11-021, the Commission proposed standards for electric distribution system inspections. These proposed rules specified certain inspection intervals for overhead and underground facilities and established criteria for maintenance and replacement of those facilities. In Decision No. 96-09-045, the Commission adopted reporting and recording requirements for electric system reliability and for individual circuits that persistently perform poorly. In Decision No. 96-09-073, the Commission proposed standards for tree trimming and vegetation management around utility distribution and transmission facilities in urban and suburban areas.

Finally, to implement the requirements of Section 364, in Decision No. 97-03-070, effective March 31, 1997, the Commission adopted G.O. 165, which established minimum requirements for electric distribution facilities for inspection (including maximum allowable inspection cycle lengths), condition rating, scheduling and performance of corrective action, record-keeping, and reporting; these G.O. 165

^{1/} All code references are to the California Public Utilities Code unless otherwise noted.

requirements are in addition to the requirements imposed upon utilities under General Order Nos. 95 and 128 to maintain a safe and reliable electric system. G.O. 165 further imposed the following reporting requirements.

Each utility shall submit to the Commission an annual report detailing its compliance with the general order. These reports will include the utility's plans for the types of inspections and equipment to be inspected during the coming year. The report shall identify the number of facilities, by type, which have been inspected during the previous period. It shall identify those facilities which were scheduled for inspection but which were not inspected according to schedule and shall explain why the inspections were not conducted, and a date certain by which the required inspection will occur. The report shall also present the total and percentage breakdown of equipment rated at each condition rating level, including that equipment determined to be in need of corrective action. Where corrective action was scheduled during the reporting period, the report will present the total and percentage of equipment which was and was not corrected during the reporting period. For the latter, an explanation will be provided, including a date certain by which required corrective action will occur. The report will also present totals and the percentage of equipment in need of corrective action, but with a schedule date beyond the reporting period, classified by the amount of time remaining before the scheduled action. All of the above required information shall be presented for each type of identified facility and shall be aggregated by district.^{2/}

III.

SUMMARY OF SCE'S INSPECTIONS AND CORRECTIVE ACTION ACTIVITIES DURING CALENDAR YEAR 2000

G.O. 165 requires annual inspection performance data, condition ratings, and corrective action information. The following is a summary of the required data. In

^{2/} GO165, Section IV.

addition, Attachment 1 provides a detailed breakdown of data for each distribution facility.

A. Patrols

As defined in G.O. 165, a circuit patrol is a visual inspection of all distribution facilities, excluding streetlights which are inspected separately. In 2000, SCE was required to patrol a total of 3,741 circuits encompassing 2,119,371 pieces of equipment (not including streetlights) to be in compliance with G.O. 165 requirements. In 2000, SCE actually patrolled 3,964 circuits and 2,292,723 pieces of equipment (not including streetlights), which exceeds G.O. 165 requirements.

1. Urban Circuit Patrols

G.O. 165 requires annual patrol of all urban circuits. In 2000, SCE patrolled 100% of our urban circuit total (3,675 circuits).

2. Rural Circuit Patrols

G.O. 165 requires biannual patrol of rural circuits. Since G.O. 165 went into effect in 1997, SCE has completed at least two patrols of 100% of our rural circuits, with the majority of circuits receiving three or four patrols. In 2000, we patrolled 82% of our rural circuits, including all rural circuits not inspected in 1999.

3. Streetlight Patrols (Urban and Rural)

G.O. 165 requires annual patrol of all urban streetlights, and biannual patrol of all rural streetlights. In the last Annual Report, SCE reported that in 2000 we planned to patrol 100% of our urban and 54% of our rural streetlight inventory (a total of 552,676 streetlights). In 2000, SCE actually patrolled 100% of our urban and 100% of our rural street light inventory (a total of 566,264 streetlights).

B. Detailed and Intrusive Inspections

1. Generally

In the last Annual Report, SCE reported we planned to complete 189,196 detailed and intrusive inspections in 2000. SCE actually completed 355,801 detailed and intrusive inspections in 2000. This represents 88% more inspections actually completed than planned. In fact, since 1998, SCE has increased actual inspections from 126,295 in 1998 to 198,010 in 1999, and to 355,801 in 2000. This represents a 282% increase in detailed and intrusive inspections from 1998 to 2000. As required by G.O. 165, SCE assigned condition ratings based on those detailed and intrusive inspections, as discussed in infra section C.

2. Intrusive Inspections

In the last Annual Report, SCE reported our plan to complete a total of 60,000 intrusive inspections of wood poles in 2000. During 2000, SCE completed a total of 102,991 intrusive inspections. Although SCE completed 72% more inspections than planned, we report a remaining balance of 25,196. This balance is due to a change in the plan, at the district level, of where the inspections would take place. As a result, certain districts completed intrusive inspections even though we had not previously planned to do so, and some districts that originally had planned to complete intrusive inspections did not do so, or completed a reduced number of inspections. SCE plans to complete intrusive inspection of 50,000 poles in 2001. Our plan is on track to have all poles older than 15 years (as of 1997) receive their first intrusive inspection by the end of 2006, as required by G.O. 165.

3. Detailed Circuit Inspections

In the last Annual Report, we reported our plan to complete 500 detailed circuit inspections in 2000. In fact, SCE completed 1,057 detailed circuit inspections in 2000. SCE plans to complete 450 detailed circuit inspections in 2001 and to have all circuits receive a first round of detailed inspections by the end of 2002, as required by G.O. 165.

C. Condition Ratings

G.O. 165 requires SCE to rate the condition of all equipment inspected. The inspections SCE conducted in 2000 resulted in findings of 14,973 facilities with Level 4 condition ratings, and 2,658 facilities with Level 5 condition ratings. The remaining balance of equipment was rated at condition Levels 1, 2, or 3.

D. 2000 Planned Corrective Actions

In the last Annual Report, SCE outlined our plan to complete corrective actions on 1,896 facilities with Level 4 condition ratings, and on 2,511 facilities with Level 5 condition ratings, for a total of 4,407 planned corrective actions during 2000. SCE actually completed corrective actions on 10,452 facilities with Level 4 condition ratings and on 4,810 facilities with Level 5 condition ratings, for a total of 15,262 completed corrective actions in 2000. SCE completed 10,855 more corrective actions (246%) than planned. These actual totals include (a) corrective actions planned for completion in 2000, (b) corrective actions that were identified during inspections conducted in 2000 and due for completion in 2000, (c) corrective actions that were identified during inspections conducted in 2000 that were due for completion in subsequent years and were completed ahead of schedule, and (d) corrective actions that were in the backlog of previous findings and due for completion in subsequent years which were actually completed ahead of schedule.

While the total number of corrective actions completed by SCE in 2000 exceeds the plan in aggregate, SCE did not complete all of the scheduled corrective actions in the following four equipment areas: overhead transformers, overhead switching and protective devices, conductors and cable, and wood poles.

Overhead Transformers: As indicated in the last Annual Report, SCE had planned to complete 284 corrective actions on overhead transformers in 2000. SCE actually completed 903 corrective actions in 2000, which is a 218% increase over the plan. Nevertheless, as of December 31, 2000, there was a remaining balance of 124 overhead transformer corrective actions. As of the writing of this report, SCE has completed 98 of the remaining 124 corrective actions, and the balance of 26 remaining corrective actions are scheduled to be completed by the end of 2001.

Overhead Switching and Protective Devices: As indicated in the last Annual Report, SCE had planned to complete 60 corrective actions on overhead switching and protective devices. SCE actually completed 134 corrective actions in 2000, which is a 123% increase over the plan. Nevertheless, as of December 31, 2000, there was a remaining balance of 25 overhead switching and protective device corrective actions. As of the writing of this report, SCE has completed 19 of the remaining 25 corrective actions, and the balance of 6 remaining corrective actions are scheduled to be completed by the end of 2001.

Overhead Conductor and Cable. As indicated in the last Annual Report, SCE had planned to complete 911 corrective actions on overhead conductor and cable. SCE actually completed 1,687 corrective actions, which is an 85% increase over the plan. Nevertheless, as of December 31, 2000, there was a remaining balance of 401 overhead conductor and cable corrective actions. As of the writing of this report, SCE has completed 350 of the remaining 401 corrective actions, and the balance of 51 remaining corrective actions are scheduled to be completed by the end of 2001.

Wood Poles. As indicated in the last Annual Report, SCE had planned to complete 2,591 corrective actions on wood poles. SCE actually completed 10,399 corrective actions, which is a 301% increase over the plan. Nevertheless, as of December 31, 2000, there was a remaining balance of 97 wood pole corrective actions. As of the writing of this report, SCE has completed all of the remaining 97 corrective actions.

Respectfully submitted,

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By: Janine M. Watkins-Ivie

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July 2, 2001

VERIFICATION

I am Director of Central Program Management for the Transmission and Distribution Business Unit of Southern California Edison Company, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this ____**th day of June, 2001**, at Santa Ana, California.

David Mead
Director of Central Program Management
SOUTHERN CALIFORNIA EDISON COMPANY

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Rosemead, California 91770

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL COMPLIANCE REPORT FILED PURSUANT TO GENERAL ORDER NO 165 on all parties identified on the attached service list. Service was effected by means indicated below:

- ☐ Placing the copies in properly addressed sealed envelopes and depositing such envelopes in the United States mail with first-class postage prepaid (Via First Class Mail);
- ☐ Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand to the offices of each addressee (Via Courier);
- ☐ Transmitting the copies via facsimile, modem, or other electronic means (Via Electronic Means).

Executed this **2nd day of July, 2001**, at Rosemead, California.

Tonya Hunter
Project Analyst
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SOUTHERN CALIFORNIA
EDISON

An EDISON INTERNATIONAL Company

Janine M. Watkins-Ivie
Senior Attorney
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July 2, 2001

Docket Clerk
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

RE: I.95-02-015/R.96-11-004

Dear Docket Clerk:

Enclosed for filing with the Commission are the original and five copies of the **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL COMPLIANCE REPORT FILED PURSUANT TO GENERAL ORDER NO 165** in the above-referenced proceeding.

We request that a copy of this document be file-stamped and returned for our records. A self-addressed, stamped envelope is enclosed for your convenience.

Your courtesy in this matter is appreciated.

Very truly yours,

Janine M. Watkins-Ivie

JMW:jmw:LW011660004.doc

Enclosures

cc: All Parties of Record
(U 338-E)

